

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:	§	
	§	
BSPV-PLANO, LLC, ¹	§	Chapter 11
	§	
Debtor.	§	Case No. 22-40276 (BTR)
	§	
	§	

DEBTOR’S WITNESS AND EXHIBIT LIST FOR MARCH 8, 2022 HEARING

BSPV-Plano, LLC (the “Debtor”), the debtor-in-possession in the above styled and numbered bankruptcy case, hereby submits this Witness and Exhibit List in support of the hearing on the Debtor’s “first day” matters to be held on **March 8, 2022, at 10:00 a.m.** (prevailing Central Time) (the “Hearing”).

WITNESSES

The Debtor reserves all rights to call any or all of the following as witnesses at the Hearing, including but not limited to by affidavit, declaration, or proffer.

1. Travis Wright, or another representative of the Debtor;
2. any witness called or designated by any other party; and
3. any rebuttal witnesses, as appropriate.

EXHIBITS

The Debtors reserve all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof:

¹ The last four (4) digits of the Debtor’s federal tax identification number is (3228). The Debtor’s address for notices is: 4851 Keller Springs Road 209, Addison, Texas 75001.

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
A.	<i>Trust Indenture</i> (Dec. 1, 2018) (the “ <u>Trust Indenture</u> ”)				
B.	<i>Loan Agreement</i> (Dec. 1, 2018) (the “ <u>Loan Agreement</u> ”)				
C.	<i>Senior Living Promissory Note, Senior Series 2018A</i> (Jan. 8, 2019) (the “ <u>Series 2018A Note</u> ”)				
D.	<i>Senior Living Promissory Note, Taxable Senior Series 2018B</i> (Jan. 8, 2019) (the “ <u>Series 2018B Note</u> ”)				
E.	<i>Senior Living Promissory Note, Subordinate Series 2018C</i> (Jan. 8, 2019) (the “ <u>Series 2018C Note</u> ”)				
F.	<i>Senior Living Promissory Note, Junior Subordinate Series 2018D</i> (Jan. 8, 2019) (the “ <u>Series 2019D Note</u> ”)				
G.	“ <u>Interim Budget</u> ”				
H.	“ <u>Final Budget</u> ”				
I.	<i>Novogradac Rent and Absorption Letter for Bridgemoor at Plano</i> (Nov. 30, 2021) (the “ <u>Novogradac Rent and Absorption Report</u> ”)				
J.	“ <u>55-Month Projection</u> ”				
K.	Temporary Certificates of Occupancy (Feb. 24, 2022) (the “ <u>Certificates of Occupancy</u> ”)				
L.	“ <u>Critical Vendors List</u> ”				
M.	“ <u>Employees List</u> ”				
N.	“ <u>Utilities List</u> ”				
O.	<i>Guaranty Agreement</i> (Mar. 2021) (the “ <u>Guaranty Agreement</u> ”)				
P.	<i>Real Estate Lien Note</i> (Mar. 8, 2022) (the “ <u>DIP Note</u> ”)				
Q.	<i>Deed of Trust</i> (Mar. 8, 2022) (the “ <u>DIP Deed of Trust</u> ”)				

No.	Description	MARKED	OFFERED	OBJECT	ADMIT
R.	Any and all motions, notices, pleadings, and other docket items filed of record in the bankruptcy case				
S.	Any and all exhibits designated by any other party				
T.	Any and all other exhibits as may be appropriate for rebuttal or impeachment purposes				

RESPECTFULLY SUBMITTED this 7th day of March, 2022.

MUNSCH HARDT KOPF & HARR, P.C.

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*Proposed Counsel to the Debtor
and Debtor in Possession*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 7th day of March, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Eastern District of Texas.

By: /s/ Thanhhan Nguyen
Thanhhan Nguyen